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12 YOUTUBE, LLC and GOOGLE, LLC

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

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16 IN RE: SOCIAL MEDIA ADOLESCENT
17 ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

18
19 This Document Relates to:

20 ALL ACTIONS
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MDL No. 3047

CASE NO.: 4:22-md-03047-YGR

**DECLARATION OF
CHRISTOPHER CHIOU IN
SUPPORT OF DEFENDANTS
YOUTUBE, LLC AND GOOGLE
LLC'S OMNIBUS STIPULATION
TO SEAL**

Honorable Yvonne Gonzalez Rogers
Honorable Peter H. Kang

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1 I, Christopher Chiou, declare as follows:

2 1. I am a partner at the law firm of Wilson Sonsini Goodrich & Rosati and attorney of
 3 record for Defendants YouTube, LLC and Google LLC (collectively (“YouTube”) in *In Re: Social*
 4 *Media Adolescent Addiction/Personal Injury Products Liability Litigation*, Case No.: 4:22-md-
 5 03047-YGR. I am licensed to practice law in the state of California and am admitted to practice
 6 before this Court. I submit this declaration in support of the Omnibus Sealing Stipulation
 7 Regarding Dkt. Nos. 848, 849. I have personal knowledge of the facts set forth in this declaration,
 8 and I could and would testify competently to their truth if called upon to do so.

9 2. On May 15, 2024, the Parties filed the Joint Letter Brief on Whether YouTube Must
 10 Designate Additional Custodians (the “Joint Letter Brief”) and its exhibit. ECF Nos. 848-849.

11 3. I have reviewed the document that YouTube seeks to redact pursuant to the Court’s
 12 Order Granting Motion to File Under Seal; Setting Sealing Procedures (ECF No. 341). Based on
 13 my review of the Joint Letter Brief and in consultation with my client, I understand there is good
 14 cause to seal the following information:

Item	Information To Be Sealed	Basis For Sealing
1	Joint Letter Brief on Whether YouTube Must Designate Additional Custodians, (ECF No. 848), redacted at 1, 2, 3.	The redacted portions contain titles and descriptions of Google and YouTube employees’ positions tied to their first and last initials that significantly increase the possibility of the public being able to find the employee’s information and subject them to unwarranted threats and harassment. For example, the personally identifying information includes quotations from employees’ LinkedIn profiles and from a book written about YouTube that could be searched to locate who the employee is and pose the possibility of subjecting them to unwarranted threats and harassment.
2	Exhibit A to the Joint Letter Brief on Whether YouTube Must Designate Additional Custodians (ECF No. 849), sealed in full.	This Exhibit contains the abbreviated names, titles, job descriptions, quotes, comments, and other personally identifiable information of 69 Google and YouTube employees that if disclosed, may subject them to unsolicited threats and harassment.

1 4. I understand that Google employees could be exposed to unwanted attention,
2 solicitation or harassment, including by individuals who conflate the allegations against the
3 company in this litigation with allegations against specific individuals and that Google employees
4 have previously been harassed, receiving unsolicited contact with threatening messages, because
5 of the public release of their names and titles. If the proposed and designated custodians' personal
6 identifying information was shared on the public docket in this case, it could similarly subject them
7 to unwarranted or potentially threatening contact.

8 I declare under penalty of perjury under the laws of the State of California that the
9 foregoing is true and correct. Executed at Los Angeles, California on May 29, 2024.

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/s/ Christopher Chiou
Christopher Chiou

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